# AMO REPORTS 85-1

## RESPONSE TO DRAFT REGULATION 309: STANDARDS FOR MUNICIPAL LAND FILL SITES

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
MARCH 1985

86-02232/

## ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, a non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total intergovernmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some six hundred (600) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interest.

The following sections and affiliated municipal professional associations form an important part of the Association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

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* Large Urban Section
* Northern Ontario Section (FONOM/NOMA)
* Rural (ROMA) Section
* Organization of Small Urban Municipalities Section

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* Association of Municipal Tax Collectors of Ontario
* Municipal Engineers Association
* Ontario Municipal Administrators Association
* Ontario Municipal Personnel Association
* Ontario Municipal Social Services Association
* Society of Directors of Municipal Recreation of Ontario

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# AMO RESPONSE TO DRAFT REGULATION 309: STANDARDS FOR MUNICIPAL LAND FILL SITES

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AMO Report 85-1 was submitted to the Honourable Morley Kells, Minister of the Environment, and the Honourable Dennis Timbrell, Minister of Municipal Affairs and Housing, March 6, 1985.

# AMO RESPONSE TO DRAFT REGULATION 309: STANDARDS FOR MUNICIPAL LAND FILL SITES

## INTRODUCTION

One of the key historical functions of the municipality has always been the collection and disposal of household waste, while the most common method of disposal continues to be disposal at a landfill site. While there has been no drastic change in household waste disposal methods over the last few decades, there has been an increasing awareness and concern as to the preservation of the natural environment and the minimization of adverse effects on it. The question which results relates to the cost differences inherent in the various degrees of regulation which may be necessary to minimize the impact of land uses, such as landfill sites, on the environment. It has, therefore, been necessary to regulate the development, operation and maintenance of municipal waste landfill sites in order to maintain consistent standards of environmental quality throughout the province.

In June of 1983, the former Minister of the Environment, the Honourable Keith C. Norton, released the Blueprint for Waste Management and the Association of Municipalities of Ontario, along with many other interested parties, submitted their comments and response. The Draft Regulation 309: Standards for Municipal Land Fill Sites is one of the many initiatives resulting from the Blueprint for Waste Management. The Association looks forward to the other reports which are to be released under the Blueprint, the most imminent being, "Guidelines for Landfill Site Selection" and "Guidelines for Land Use Adjacent to Landfill Sites".

In responding to Regulation 309: Standards for Municipal Land Fill Sites AMO will, where necessary, outline the ministry's proposal, present AMO policy if any exists, and make recommendations as to what the Association believes should be addressed in the revised version of Regulation 309.

## CLASSIFICATION

Regulation 309 refers to municipal waste, which was one of the classifications referred to in the Blueprint For Waste Management.

> "municipal waste - residential, industrial, commercial and institutional wastes similar to normal household wastes."

The ministry's Blueprint for Waste Management report also defined special and controlled wastes as classifications of waste. In that Regulation 309 addresses only the standards for municipal landfill sites accepting municipal waste, the Association would like to make it known that it would also like to be involved in discussions regarding the standards for other waste classifications once they are developed. Also, since many large municipal landfill sites accept special wastes, as well as municipal wastes, the Association would like the ministry to clarify whether landfill sites of this type are covered under Regulation 309.

As well, the Association would like to review and comment on the "Guidelines for Landfill Site Selection" and "Guidelines for Land Use Adjacent to Landfill Sites" as soon as these draft documents are made available.

Therefore, AMO recommends:

1. That the development of standards for other classifications of waste disposal sites, the development of "Guidelines for Landfill Site Selection" and the "Guidelines for Land Use Adjacent to Landfill Sites", involve AMO representatives and discussion at an early stage.

2. That the ministry clarify whether or not landfill sites which accept special waste, along with municipal waste, are to be governed by Regulation 309: Standards for Municipal Land Fill Sites.

## CATEGORIZATION OF LANDFILL SITES

The Draft Regulation 309: Standards for Municipal Land Fill Sites proposes to categorize municipal landfill sites into different classes based on the following criteria:

(a) tne degree of disposal site usage or lifetime site capacity, which divides sites into three groups: (1) lifetime capacity of greater than 100,000 tonnes (greater than 5,000 T/year); (2) between 20,000 and 100,000 tonnes (1,000 to 5,000 T/year); and (3) less than 20,000 tonnes (1,000 T/year).

(b) a land separation distance which divides sites into three groups: (1) greater than 5 km. from the perimeter of a landfill area to any above or below grade structures, services or facilities, human activities or part of a natural environment where its quality of use would likely

be impaired; (2) 500 m. to 5 km. from the perimeter of landfill area to same; (3) less than 500 m. from perimeter of landfill area to same.

This classification system results in the development of a matrix (attached as Appendix A) based on these three distance groups, each divided into three classes of site usage. Therefore, 9 classes of landfill sites have evolved, with the standards and regulations to be applied more stringently for the higher classifications of these landfill sites.

While recognizing and supporting the necessity to classify landfill sites based on these two essential criteria, the Association does have a major concern regarding the ease by which a landfill site can be "bumped up" or "down" by nearby construction, (for example, should a site go from class 1 to class 4 as a result of local construction activity) and the implications of these changes in classification. While a municipality may have some control over the occurrence of this type of construction activity, it would nevertheless be responsible for the consequent upgrading of the landfill site (and the associated costs) due to site reclassification.

While the Association realizes that there are guidelines forthcoming on the development of lands adjacent to or abutting landfill sites, the Association stresses the need for stringent guidelines which are complementary to and consistent with the Standards for Municipal Landfill Sites.

Therefore, AMO recommends:

3. That the ministry, when establishing guidelines regarding the development of lands adjacent to or abutting landfill sites, consider the Association's concern about easily upgraded or downgraded landfill site classifications and develop strict guidelines for lands adjacent to or abutting landfill sites so as to minimize this occurrence.

The Association also feels that the unique situations which exist in the province's resort areas, where population distribution is largely seasonal, should be recognized in the regulations. In these areas, landfill sites are largely under-utilized in the winter months and more heavily used during the summer season. This more intensive use in the summer months with little use throughout the winter is not recognized in the disposal site usage category. For example, a site could function as a class 2 landfill site in the summer months and a class 1 site for the rest of the year.

Therefore, AMO recommends:

4. That the categorization system, as proposed by the ministry, should allow for some form of flexibility for the unique situation of landfill sites in resort areas, particularly where the objective of environmentally sound landfill sites can be realized without the owner/operator having to comply to stringent regulations throughout the full 12 months of the year.

For example, regular cell cover requirements and staffing requirements are items which should be seasonally adjusted for sites whose seasonal use varies significantly. (See Appendix A)

GUIDELINES

The guidelines as presented outline twenty-seven factors identified as standards to be enforced. These factors are to be implemented in the various stages in the development of a landfill site and can, therefore, be viewed in terms of development and establishment, operations and maintenance. The various requirements as identified are to be the responsibility of the owner/operator.

With regard to the standards in general, the Association would like to suggest some housekeeping recommendations first.

There are some vaguely worded and general statements in the text of the requirements with regard to certain standards. An example is the reference to the contingency plan standard, where the guidelines state that, "A backup measure to accommodate any failure in the design of a landfill should be prepared for all sites". There may be some doubt as to whether or not "should be prepared" would be interpreted as being optional or that such measures will eventually be required. In light of this and other similar general wording throughout the written text of the 27 prepared standards, AMO recommends:

5. That the vague and general wording applying to certain standards be clarified to define terms such as "should be prepared" (contingency plan requirements) and "may be considered" (off-site screening requirements), and that when clarifying the true intent of the requirements, the Association would prefer that the ministry apply a permissive interpretation.

The Association would also like to point out that references are made throughout the guidelines to the "regional director" or occasionally simply to "director", and in the Background section to "hearing boards".

Therefore, AMO recommends:

6. As these guidelines apply to many municipalities as owner/ operators of landfill sites, AMO recommends that the guidelines define and clarify the function of the "regional director" and the "hearing boards" in terms of their enforcement of the regulations.

With regard to landfill site standard number 11, regarding contingency plans, the Association would like to make its views known. The Association recognizes the value of having a backup plan in place to accommodate any failure that may occur in the design of a site. However, the Association also feels, particularly with regard to new sites, that if properly located and, with the suitable site evaluation undertaken, the contingency plan should never have to be implemented.

The contingency plan as proposed, would contain extensive information including the details of new collection and treatment systems, the acquisition of additional property and provision of alternative services as well as cost information and monitoring plans. The Association suggests that this type of contingency plan should be required for larger classifications of landfill sites and notes that these requirements will be particularly onerous for smaller sites. Such detailed requirements for possible backup measures for small rural sites will not be well received by many owner/ operators, particularly in light of the fact that the contingency plan may never be implemented.

Therefore, AMO recommends:

7. The contingency plan requirements are onerous particularly for smaller classifications of landfill sites as outlined in the Matrix. AMO, therefore, recommends that landfill classes 1, 2, 4 and 7 be exempted from the proposed contingency plan requirements.

The Ministry of the Environment's Blueprint for Waste Management proposed that all landfill sites accepting municipal waste, with a capacity of 100,000 tonnes, be subject to the Environmental Assessment Act. The guidelines propose that those in the highest category (lifetime capacity of greater than 100,000 tonnes or 5,000 T/year) will be subject to the Environmental Assessment Act.

The Association supports the principle of applying the Environmental Assessment Act to waste management facilities. In doing so the Association would like to qualify this support by drawing the ministry's attention to

AMO's policy guideline EC-02, which was also outlined in AMO's Response To The Blueprint for Waste Management.

> EC-02 - Policy
>
> The Association supports the application of an environmental assessment process to those municipal undertakings which could adversely affect the environment. However, the Association accords its support on the basis that the procedures under an environmental assessment application do not lead to the creation of excessive delays in carrying out municipal projects or an undue increase in administrative and/or construction costs which would be borne by the municipal taxpayer. The Environmental Assessment Act should also apply to those projects undertaken by the Government of Ontario, its agencies and crown corporations in the same manner as municipal government projects.

The Association does have concerns regarding the financial impact of some of the guidelines, if enacted, on smaller and rural municipalities, particularly when 68% of the existing sites have a capacity of less than 1,000 tonnes/year and are for the most part located in rural areas. While this is a comment relating to the guidelines themselves, AMO will address this issue in the next section dealing with implementation.

## IMPLEMENTATION

The Ministry of the Environment has requested from AMO comments on a process of implementation. The transitional stage of phase-in for new regulations is usually a most difficult decision.

On December 5, 1984, following a preliminary review of Draft Regulation 309, the Association forwarded a letter (attached as Appendix B) to the former Minister, the Honourable Andrew Brandt, regarding the phasing in of the proposed regulation. In light of the Association's concerns regarding the financial impact of this regulation, it was recommended:

8. That existing sites classified for light to medium usage, usually those in smaller and rural municipalities, be permitted to continue to operate under the present landfill regulations, until such time as a county or regional waste management master plan has been approved.

This would effectively exempt existing light to medium usage sites (i.e. as indicated in the Matrix (attached as Appendix A), light to medium usage

sites accept up to 100,000 tonnes per lifetime) from the new regulations until a county or regional waste management master plan, as defined in the Blueprint for Waste Management, has been approved. In other words, Regulation 309 would initially apply only to all new landfill sites and heavier classifications of existing sites. It should perhaps be mentioned that landfill sites are based on a 20 year life span in any case. Therefore, the exemption provision would end either when a county or regional waste management master plan was approved or when the sites' lifetime capacities have been reached. While the ministry may perceive this as an overly gradual implementation phase, the Association feels that this is necessary to alleviate the sudden financial impact and resultant budget increases on many smaller and rural municipalities.

With regard to the financial issue and the ministry's desire to achieve more environmentally sound landfill sites through more stringent requirements, the Association recommends that financial assistance be provided by the province when environmental assessment or other site-related environmental impact studies are required. This assistance would be of particular benefit once again to the rural areas where the majority of sites are located.

Therefore AMO recommends:

9. That the provincial government provide the capital funding necessary for the purpose of undertaking any required environmental assessment or other required site-related environmental impact studies.

The Association would also suggest that an information/education package be circulated to all municipally owned and/or operated landfill sites in order that they can prepare for and become knowledgable about the new regulations governing municipal waste landfill sites.

Therefore, AMO recommends:

10. That information/education packages be forwarded to all municipal officials involved in the operation of a municipal waste landfill site in all areas where municipalities are owners and/or operators of such sites.

The Association of Municipaities of Ontario would like to thank the ministry for the opportunity of commenting on the Draft Regulation 309 and looks forward to reviewing other guidelines evolving from the ministry's Blueprint for Waste Management.

## SUMMARY OF RECOMMENDATIONS

1. That the development of standards for other classifications of waste disposal sites, the development of "Guidelines for Landfill Site Selection" and the "Guidelines for Land Use Adjacent to Landfill Sites", involve AMO representatives and discussion at an early stage.

2. That the ministry clarify whether or not landfill sites which accept special waste, along with municipal waste, are to be governed by Regulation 309: Standards for Municipal Land Fill Sites.

3. That the ministry, when establishing guidelines regarding the development of lands adjacent to or abutting landfill sites, consider the Association's concern about easily upgraded or downgraded landfill site classifications and develop strict guidelines for lands adjacent to or abutting landfill sites so as to minimize this occurrence.

4. That the categorization system, as proposed by the ministry, should allow for some form of flexibility for the unique situation of landfill sites in resort areas, particularly where the objective of environmentally sound landfill sites can be realized without the owner/operator having to comply to stringent regulations throughout the full 12 months of the year.

5. That the vague and general wording applying to certain standards be clarified to define terms such as "should be prepared" (contingency plan requirements) and "may be considered" (off-site screening requirements), and that when clarifying the true intent of the requirements, the Association would prefer that the ministry apply a permissive interpretation.

6. As these guidelines apply to many municipalities as owner/operators of landfill sites, AMO recommends that the guidelines define and clarify the function of the "regional director" and the "hearing boards" in terms of their enforcement of the regulations.

7. The contingency plan requirements are onerous particularly for smaller classifications of landfill sites as outlined in the

Matrix. AMO, therefore, recommends that landfill classes 1, 2, 4 and 7 be exempted from the proposed contingency plan requirements.

8. That existing sites classified for light to medium usage, usually those in smaller and rural municipalities, be permitted to continue to operate under the present landfill regulations, until such time as a county or regional waste management master plan has been approved.

9. That the provincial government provide the capital funding necessary for the purpose of undertaking any required environmental assessment or other required site-related environmental impact studies.

10. That information/education packages be forwarded to all municipal officials involved in the operation of a municipal waste landfill site in all areas where municipalities are owners and/or operators of such sites.

APPENDIX A

**REGULATION 309**

LEGEND

L-<20,000T/life time  M-20,000-100,000 T/life time  H->100,000T/life time

| FACTORS | GROUP 1 | | | GROUP 2 | | | Group 3 | | | COMMENTS |
|---|---|---|---|---|---|---|---|---|---|---|
| | >5 km | | | 500 m-5 km | | | <500 m | | | |
| CLASSES/ USAGE | 1 LIGHT | 2 MEDIUM | 3 HEAVY | 4 LIGHT | 5 MEDIUM | 6 HEAVY | 7 LIGHT | 8 MEDIUM | 9 HEAVY | T/yr |
| Legal Survey | <---------- Survey required for all classes of sites ----------> | | | | | | | | | Guidelines |
| Registration on Title | <---------- Required for all classes of sites ----------> | | | | | | | | | Guidelines |
| Development Plans | <---------- Required for all sites ----------> | | | | | | | | | Guidelines |
| Fencing | Min. farm fence or natural barriers for 1, 2, 4, 5, 7 For 3, 6, 8, 9 chain link or similar | | | | | | | | | Guidelines |
| | <---------- Gates required where supervision is necessary ----------> | | | | | | | | | |
| Site Preparation Report | <---------- For all sites ----------> | | | | | | | | | |
| Buffer | <---------- 60 metre desirable (min 30 metre) ----------> | | | | | | | | | Guidelines |
| On-site Roads | <--- Min road system to carry traffic under all normal weather conditions ---> | | | | | | | | | Guidelines |
| Signs | <---------- Min 1 sign at entrance ----------> | | | | | | | | | Guidelines |
| Screening | Visual screening from road | | | Visual screen from sensitive land uses | | | Screening from all sides of the site | | | Guidelines |

| | GROUP 1 | | | GROUP 2 | | | Group 3 | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| FACTORS | >5 km | | | 500 m-5 km | | | <500 m | | | COMMENTS |
| CLASSES/ USAGE | 1 LIGHT | 2 MEDIUM | 3 HEAVY | 4 LIGHT | 5 MEDIUM | 6 HEAVY | 7 LIGHT | 8 MEDIUM | 9 HEAVY | T/yr |
| Aesthetics | <---------- Site controls ----------> | | | | | | | | | Guidelines Litter, House-keeping. |
| Contingency Plan | <---------- For all sites ----------> | | | | | | | | | Guidelines |
| Hydrogeological & Hydrology Evaluation | <---------- For all sites ----------> | | | | | | | | | Guidelines |
| Surface Drainage | <---- Site drainage systems to protect adjacent property owners ----> | | | | | | | | | Guidelines |
| Cell Cover | Monthly | Daily | Daily | Weekly | Daily | Daily | Weekly | Daily | Dailly | Soil or equivalent |
| Burning | <---------- Uncontrolled not permitted ----------> | | | | | | | | | Guidelines be tied to super-vision |
| Final Cover | <---------- Min. .75m + vegetation ----------> Final cover Prog. for classes 2, 3, 5, 6, 8 & 9 | | | | | | | | | (B) - Proponents to provide a final cover prog. |
| Leachate Control | <---------- Attenuation on site, mechanical controls ----------> | | | | | | | | | Guidelines |
| Gas Control | <---------- Min-on site for all classes ----------> | | | | | | | | | Buffer can be included. Guidelines |
| Scavenging | Uncontrolled <---------- Not permitted ----------> | | | | | | | | | Guidelines Development plan. |

| FACTORS | GROUP 1 | | | GROUP 2 | | | Group 3 | | | COMMENTS |
|---|---|---|---|---|---|---|---|---|---|---|
| | >5 km | | | 500 m-5 km | | | <500 m | | | |
| CLASSES/ USAGE | 1 LIGHT | 2 MEDIUM | 3 HEAVY | 4 LIGHT | 5 MEDIUM | 6 HEAVY | 7 LIGHT | 8 MEDIUM | 9 HEAVY | T/yr |
| Supervision | Weekly insp. | When open | When open | Weekly insp. | When open | When open | Daily insp. | When open | When open | Insp. & Sup. allow for seasonal use. Guidelines |
| Vectors & Rodents | Conting. measures | Conting. measures | P.C. | Conting. measures | P.C. | P.C. | P.C. | P.C. | P.C. | P.C. - Pest control measures |
| Fires, Accidents | 0 | Signs | (A) | Signs | Signs | (A) | Signs | <-----(A)-----> | | (A) - Control measures and contingency plan |
| Air Emission | 0 | 0 | Site | 0 | <---------- Site measures ----------> | | | | | Guidelines. Dust, smoke, noise & ordour controls. |
| Monitoring Program | <---------- General & predictive monitoring program for all sites ----------> | | | | | | | | | Gas, leachate Guidelines |
| Closure Program | <---------- For all sites ----------> | | | | | | | | | Guidelines |
| Status Reports | Every two years | <------ Annual status reports to Regional Directors -------> for all classes of sites | | | | | | | | Related to development plan. Guidelines |
| Financial Guarantees | <---------- For all private site ----------> | | | | | | | | | |

NOTE: 1,000 tonnes can be equated to approximately 1,330 persons.

APPENDIX B

AMO

Association of Municipalities of Ontario

Suite 902 • 100 University Avenue, Toronto, Ontario M5J 1V6 • Telephone 593-1441

December 5, 1984

The Honourable Andrew Brandt
Minister of the Environment
15th Floor
135 St. Clair Ave. W.
Toronto, Ontario
M4V 1P5

Dear Mr. Minister:

The Association of Municipalities of Ontario wishes to formally thank you for the opportunity of reviewing, in draft form with Ministry staff at a recent Planning and Environment Committee Meeting, Regulation 309 - Standards for Municipal Land Fill Sites. It is the Association's understanding that the revisions to this regulation are one of the many initiatives resulting from the Ministry of Environments' "Blueprint for Waste Management". AMO in its response to the "Blueprint for Waste Management" did stress the necessity for the Association "to review and comment on any proposed legislative changes that would impact on municipalities".

At the November 7, 1984 meeting of the AMO Planning and Environment Committee, Ministry staff also indicated that further reports would be released for comment by the Ministry: the Ministry of Environments' position paper on the "Blueprint for Waste Management", Guidelines for Land Fill Site Selection, and Guidelines for Land use Adjacent to Land-Fill Sites. AMO anticipates responding to the above mentioned issues as well.

The Association, however, at this point in time, wishes to advise of its concerns, resulting from its preliminary review of the draft Regulation 309, Standards for Municipal Land Fill sites. The Ministry has stated in this document that the approach, as proposed, may require an increase in operational budgets, with the end result more environmentally sound land fill sites. As well the proposed approach would initially apply to new sites. A phase-in program would be developed for existing sites.

The Association does have concerns regarding the financial impact of the proposed regulations, on smaller and rural municipalities. The majority of land fill sites regulated by these standards would be those located in rural areas (68% of the existing land-fill sites have a capacity of less than 20,000 tonnes).

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Therefore, the Association recommends the following:

> That existing sites classified for light to medium usage, usually those in smaller and rural municipalities, be permitted to continue to operate under the present land-fill regulations (grandfathered), until such time as a county or regional waste management master plan has been approved.

AMO will be responding, in greater detail, to the draft Regulation 309, Standards for Municipal Land Fill Sites at a later date. The Ministry's proposal will be particularly reviewed by the Rural (ROMA) and Small Urban (OSUM) Sections of the Association.

We look forward to continued dialogue on this matter, and others evolving from the Ministry's "Blueprint for Waste Management".

Yours truly

Ron Eddy

Ron Eddy
President, AMO

RE/mb

c.c Claude Bennett
Minister of Municipal
Affairs and Housing

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